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9 UNITED STATES DISTRICT  
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

4:15-CR-6049-EFS

12 Plaintiff,

SECOND SUPERSEDING  
INDICTMENT

13 vs.

14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]  
Vio: 21 U.S.C. § 846  
Conspiracy to Distribute 500  
Grams or More of a Mixture or  
Substance Containing a  
Detectable Amount of  
Methamphetamine, 5 Kilograms  
or More of Cocaine, 1 Kilogram  
or More of Heroin and 400 grams  
or More of N-phenyl-N  
Propanamide  
(Count 1)

Vio: 18 U.S.C. § 1956(h)  
Conspiracy to Commit Money  
Laundering (Count 2)

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(ii)  
Possession with the Intent to  
Distribute 5 Kilograms or more of  
Cocaine (Count 3)

SECOND SUPERSEDING INDICTMENT – 1

Second Superseding Indictment.docx

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 MARCIAL BRAVO ZAMBRANO,  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
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10 Defendants.  
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Vio: 18 U.S.C. § 1956(a)(1)(B)(i)  
Money Laundering  
(Counts 4, 5, 6, 7, 10, 11, 12, 14)

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(viii)  
Possession with the Intent to  
Distribute 50 grams or more of  
Actual Methamphetamine  
(Count 8)

Vio: 18 U.S.C. 1956(a)(1)(B)(i)  
International Money Laundering  
(Counts 9, 13)

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(i), (vi)  
Possession with the Intent to  
Distribute 1 Kilogram or More of  
a Mixture or Substance  
Containing Heroin and  
400 grams or More of a Mixture  
or Substance Containing N-  
phenyl-N Propanamide  
(Count 15)

Notice of Criminal Forfeiture  
Allegations

The Grand Jury Charges:

### COUNT ONE

Beginning on a date unknown but by on or about January 2010 continuing  
until on or about December 6, 2016, in the Eastern District of Washington and  
elsewhere, the Defendants, [REDACTED]

SECOND SUPERSEDING INDICTMENT – 2

Second Superseding.Indictment.docx

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED] MARCIAL BRAVO

12 ZAMBRANO, [REDACTED]  
13 [REDACTED]  
14 [REDACTED]

15 did knowingly and intentionally combine, conspire, confederate and agree together  
16 with each other and other persons, both known and unknown to the Grand Jury, to  
17 commit the following offense against the United States, to wit: distribution of 500  
18 grams or more of a mixture or substance containing a detectable amount of  
19 Methamphetamine, 5 kilograms or more of a mixture or substance containing a  
20 detectable amount of Cocaine, 1 kilograms or more of a mixture or substance  
21 containing a detectable amount of heroin and 400 grams or more of a mixture or  
22 substance containing a detectable amount of N-phenyl-N Propanamide, all  
23 Schedule II controlled substances, in violation of 21 U.S.C. § 841(a)(1),  
24 (b)(1)(A)(i), (ii)(I), (vi), and (viii); all in violation of 21 U.S.C. § 846.  
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SECOND SUPERSEDING INDICTMENT – 3

Second Superseding Indictment.docx

**COUNT TWO**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED],

[REDACTED]

[REDACTED],

[REDACTED]

[REDACTED]

**(1956(a)(1))**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 (1956(a)(2))

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 COUNT THREE

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23

**COUNT FOUR**

[REDACTED],

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**COUNT FIVE**

[REDACTED]

[REDACTED],

[REDACTED]

[REDACTED]

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7 [REDACTED]  
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9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]

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17 **COUNT SIX**

18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
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27 [REDACTED]  
28 [REDACTED]

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11 **COUNT SEVEN**

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27 [REDACTED]  
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[REDACTED]

[REDACTED]

[REDACTED]

**COUNT EIGHT**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**COUNT NINE**

[REDACTED],

[REDACTED]

[REDACTED]

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[REDACTED]

COUNT TEN

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[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

**COUNT ELEVEN**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

**COUNT TWELVE**

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[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**COUNT THIRTEEN**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**SECOND SUPERSEDING INDICTMENT – 12**

Second Superseding.Indictment.docx

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## COUNT FOURTEEN

**COUNT FIFTEEN**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS**

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21 U.S.C. § 846, [REDACTED]

[REDACTED]

[REDACTED],

[REDACTED]

[REDACTED],

1 [REDACTED],  
2 [REDACTED]  
3  
4 [REDACTED]),  
5 [REDACTED]  
6  
7 [REDACTED], MARCIAL BRAVO  
8 ZAMBRANO, [REDACTED]  
9  
10 [REDACTED] and, shall forfeit to the United  
11 States of America, any property constituting, or derived from, any proceeds  
12 obtained, directly or indirectly, as the result of such offense(s) and any property  
13 used or intended to be used, in any manner or part, to commit or to facilitate the  
14 commission of the offense(s).  
15

16  
17 If any forfeitable property, as a result of any act or omission of the  
18 Defendants:

- 19  
20 (a) cannot be located upon the exercise of due diligence;  
21 (b) has been transferred or sold to, or deposited with, a third party;  
22 (c) has been placed beyond the jurisdiction of the court;  
23 (d) has been substantially diminished in value; or  
24 (e) has been commingled with other property which cannot be divided  
25 without difficulty;  
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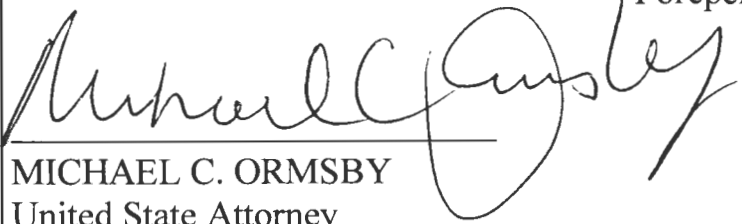
1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p).  
3

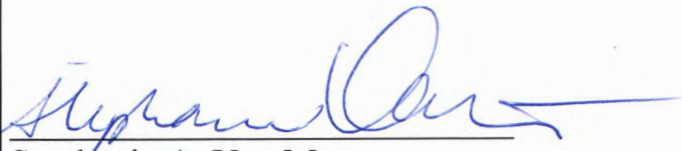
4 DATED this \_\_\_\_ day of December 2016.  
5

6 A TRUE BILL

7   
8

9 Foreperson

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11  
12 MICHAEL C. ORMSBY  
13 United State Attorney

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15  
16 Stephanie A. Van Marter  
17 Assistant United States Attorney  
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